REMARKS

The Office Action, mailed November 15, 2006, considered claims 1-41. Claims 1-11, 15-23, 25-27, and 32-38 are rejected under 35 U.S.C. 103(a) as being unpatentable over Serlet et al. (6,842,770), hereinafter *Serlet,* and Charisius et al. (2002/0078432), hereinafter *Charisius.* Claims 36 and 37 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Serlet* and further in view of French (6,654,794). Claims 12-14, 28-30, and 39-41 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Serlet* and *Charisius* and further in view of Prust (6,714,968), hereinafter *Prust.* Claim 31 is rejected under 35 U.S.C. 103(a) as being unpatentable over *Serlet* and *Prust.*[1]

By this amendment claims 1, 4, 5, 7, 9, 11, 15, 16, 32 and 33 have been amended. Claims 19, 20 and 25 have been cancelled. Accordingly, claims 1-18, 21-24 and 26-41 are pending, of which claims 1, 15, 16, 32 and 33 are the only independent claims at issue.[2]

The present invention is generally directed to automatically and transparently handling WebDAV server and file access requests. For example, claim 1 defines receiving at an I/O manager an I/O request initiated from an application program, wherein the request indicates the filename of a file. Next, claim 1 defines polling available redirectors to determine which redirectors are configured to handle the application program's I/O request, each redirector corresponding to one or more servers of a specified server type. Next, claim 1 defines for any redirectors that respond indicating an ability to handle the application program's I/O request, prioritizing the responses such that a WebDAV redirector is given priory to handle the I/O request and to indicate whether the specified share and file is accessible on a WebDAV server. Next, claim 1 defines, if the specified share and file are accessible, requesting a local file system to create the file, downloading the file to a local cache of the file system, and returning a file handle corresponding to the file in the local cache to the application program. Next, claim 1 defines providing access to the file in the local cache of the file system via the file handle. Lastly, claim 1 defines receiving a request to close the file via the file handle, and when received, uploading the file from the local cache of the file system to the WebDAV server.

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[1] Although the prior art status of the cited art is not being challenged at this time, Applicant reserves the right to challenge the prior art status of the cited art at any appropriate time, should it arise. Accordingly, any arguments and amendments made herein should not be construed as acquiescing to any prior art status of the cited art.

[2] Support for the amendments to the claims are found throughout the specification and previously presented claims, including but not limited to paragraphs [0030]-[0035] and Figure 2.

Claim 15 is a recordable computer-readable storage medium claim corresponding to claim 1. Claim 16 is a method claim similar to claim 1, more specifically related to using a URI in the I/O request. Claim 32 is a recordable computer-readable storage medium claim corresponding to claim 16. Claim 33 is a system claim similar to claim 1.

Applicants respectfully submit that the cited art of record does not anticipate or otherwise render the amended claims unpatentable for at least the reason that the cited art does not disclose, suggest, or enable each and every element of these claims.

Serlet describes a system and method by which computer users can seamlessly access remote files using any application with a well-known protocol (Col. 2:51-54). *Serlet* describes a seamless files system (SFS) that allows access to remote files, including WebDAV files, in the same manner as accessing local files without requiring any changes to the program's method of communication with the file system (Col. 2:54-59). SFS is an operating system (OS) extension that forwards remote file requests to a network access program (NAP). The NAP reformats the request to a common protocol (Col. 2:60-67). The remote file system may be cached in the local file system, after which the two file systems are synchronized (Col. 3:10-16).

Charisius describes a method and system for providing a workflow modeling tool that allows an enterprise to integrate a business process with a project plan (par. [0010]). Users of the tool can create a project plan based on a workflow, manage the execution of the plan, and track the progress of the plan execution (par. [0010]). *Charisius* further describes an Activity I/O Condition Designer Module that allows a user to define a condition model and store it using WebDAV such that the workflows may be accessible by multiple authorized users (par. [0109]-[0115]).

Neither *Serlet* nor *Charisius* teaches or suggests polling available redirectors to determine which redirectors are configured to handle the application program's I/O request, each redirector corresponding to one or more servers of a specified server type, as recited in claim 1. Furthermore, neither *Serlet* nor *Charisius* teaches or suggests for any redirectors that respond indicating an ability to handle the application program's I/O request, prioritizing the responses such that a WebDAV redirector is given priory to handle the I/O request and to indicate whether the specified share and file is accessible on a WebDAV server, as recited in claim 1. At least for either of these reasons, claim 1 patentably defines over the art of record. At least for either of these reasons, claims 16 and 33 also patentably define over the art of record. Since each of the

dependent claims depend from one of claims 1, 16 and 33 each of the dependent claims also patentably define over the art of record for at least either of the same reasons.

Claims 15 and 32 were rejected under 35 U.S.C. § 101 because they recites non-statutory subject matter. Claims 15 and 32 have each been amended to recite "A recordable computer-readable storage medium." Accordingly, Applicants respectfully request that the 35 U.S.C. § 101 rejection of claims 15 and 32 be withdrawn.

Claim 33 was objected to because of minor informalities. The informalities in claim 33 have been amended. Accordingly, Applicants respectfully request the withdrawal of the objection to claim 33.

In view of the foregoing, Applicant respectfully submits that the other rejections to the claims are now moot and do not, therefore, need to be addressed individually at this time. It will be appreciated, however, that this should not be construed as Applicant acquiescing to any of the purported teachings or assertions made in the last action regarding the cited art or the pending application, including any official notice. Instead, Applicant reserves the right to challenge any of the purported teachings or assertions made in the last action at any appropriate time in the future, should the need arise. Furthermore, to the extent that the Examiner has relied on any Official Notice, explicitly or implicitly, Applicant specifically requests that the Examiner provide references supporting the teachings officially noticed, as well as the required motivation or suggestion to combine the relied upon notice with the other art of record.

In the event that the Examiner finds remaining impediment to a prompt allowance of this application that may be clarified through a telephone interview, the Examiner is requested to contact the undersigned attorney at (801) 533-9800.

Dated this 15th day of February, 2007.

Respectfully submitted,

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